IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

IN RE THE APPLICATION OF	) Pierre Lescuyer
SERIAL NO.:	) 10/579,575
FILED:	) 8/24/2009
CONFIRMATION NO.	) 5664
ART UNIT:	) 2443
EXAMINER:	) Kyung H. Shin
ATTORNEY DOCKET NO.	) 920522-114350

REPLY BRIEF

Honorable Director of Patents and Trademarks
P.O. Box 1450
Alexandria, VA 22313-1450

Dear Sir:

This Reply Brief is being filed in view of arguments raised by the Examiner in the Examiner's Answer of July 7, 2011.

In his Answer, with regard to claim 26, the Examiner repeats the assertions he made in the "Response to Argument" that a GSN is considered a mobile station. The Examiner provides a definition of a mobile station as a **wireless portable device.** While this definition is accurate, in part, it is also misleading because one of ordinary skill in the art would understand a wireless portable device to mean a wireless device that can easily be carried by a human being, e.g. a mobile phone or something only slightly bigger. The Examiner provides no evidence that a GSN is such a mobile station. In fact, a GSN or GPRS support node such as, for example, the Cisco Gateway GPRS Support Node (GGSN) (see http://www.cisco.com/warp/public/cc/so/neso/gprs/ggsn4_ds.htm#wp1002488) is based on a router and obviously weighs tens of kilograms. This is not what the ordinarily skilled person would describe as a mobile station. In the 3G systems, a mobile station (MS) is now referred to as user equipment (UE). Hippelainen, in column 2, lines 53-54, refers to activating PDP context using mobility management procedures; and in column 8 lines 20-31 refers to context control unit 12, which is part of the **GGSN** 4. Thus, Hippelainen does not disclose a mobile station.

The Examiner also argues that a GSN is a mobile station because it provides communication links for mobile terminals. This is like arguing that a satellite is a telephone because it provides communication links to telephones.

Applicant maintains its argument that the obviousness rejection is erroneous since neither Kavanaugh nor Hippelainen discloses or hints at creating, in **the mobile station**, a corresponding security task that furnishes a respective firewall function, in response to activation of each of the plural communication contexts by **the mobile station**. Moreover, there is no hint in either Kavanaugh or Hippelainen regarding limiting data flow in each of the communication sessions using the respective firewall function **in the mobile station** according to the corresponding set of filtration parameters.

The GTP filter of Kavanaugh inspects "*all GTP packets and performs specific filtering rules ...*" (Kavanaugh paragraph [0034]). As noted in Kavanaugh, "*it would be advantageous to have a method of filtering IP packets when using GTP signalling messages between GSNs in a GPRS network.*" Id., paragraph [0012]. A "*GSN*" refers to a GPRS support node, as explained in paragraph [0005] – [0009] of Kavanaugh. As further noted in Kavanaugh, a GTP tunnel is established for each PDP context, where the GTP tunnel includes a GTP control plane over a Gn or Gp interface, and a GTP user plane over a Gn, Gp, and Iu interfaces. Id., paragraph [0009]. As depicted in Fig. 1 of Kavanaugh, the Gn interfaces are between SGSNs, between an SGSN and a GGSN, or between the GGSN and a GTP map protocol converting GSN. Thus it is clear that the GTP filter, which is used to examine GTP messages, is implemented in a GSN, and **not** in a mobile station. Therefore, it is clear that Kavanaugh fails to disclose at least the "*creating*" and "*limiting*" elements of claim 26.
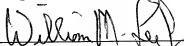
Thus the attempt to combine the teachings of Kavanaugh and Hippelainen must fail.

With reference to the other claims, the Examiner has not responded successfully to Applicant's arguments, and therefore these claims are also submitted to be allowable.

The result of this appeal is thus awaited.

September 7, 2011

Respectfully submitted,

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